

EXHIBIT 1

8/27/2024

VirtaMove Corp. v. Amazon.com, Inc., et al Susan Cameron 30(b)(6)

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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION

_____)	
VIRTAMOVE, CORP.,)	
Plaintiff,)	
)	Case Number:
V.)	7:24-CV-00030
)	
AMAZON.COM, INC.; AMAZON.COM)	
SERVICES LLC; and AMAZON WEB)	
SERVICES, INC.,)	
Defendants.)	
_____)	

30 (b) (6) DEPOSITION OF SUSAN CAMERON
ON BEHALF OF VIRTAMOVE, CORP.

August 27, 2024

11:02 a.m. Eastern Daylight Time

Reported by: Lori J. Goodin, RPR, CRR, RSA,
California CSR #13959

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1 REMOTE APPEARANCES:

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17

18 Also Present:

19 Billy Fahnert, Videographer/Document Tech

20

21

22

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10 SUSAN CAMERON

11 VirtaMove, Corp. V. Amazon.com, Inc., et al

12 Tuesday, August 27, 2024

13 Lori J. Goodin, RPR, CRR, RSA,

14 California CSR #13959

15 EXHIBIT DESCRIPTION PAGE

16 Exhibit 1001 VM_AMAZON_0001097, Travel

17 Itinerary for Mr. Topitsch

18 to Texas, 1/28/16 33

19 Exhibit 1002 VM_AMAZON_0001123,

20 Registration for Greg O'Connor

21 to attend AWS re:Invent,

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1 TUESDAY, AUGUST 27, 2024, 11:02 a.m. EST

2

3 PROCEEDINGS

4 THE VIDEOGRAPHER: We are on the
5 record. This is the remote 30(b)(6)
6 deposition of VirtaMove Corporation
7 represented by Susan Cameron, in the matter
8 of VirtaMove Corp. versus Amazon.com, Inc.,
9 et al., filed in the United States District
10 Court for the Western District of Texas.

11 My name is Billy Fahnert; I am the
12 video technician today. The court reporter
13 is Lori Goodin. We both represent Digital
14 Evidence Group.

15 Today's date is August 27, 2024.
16 The time is 11:02 a.m. Eastern Standard Time.

17 All parties have stipulated to the
18 witness being sworn in remotely. Will
19 counsel please identify yourselves for the
20 record, and then the witness will be sworn
21 in.

22 MR. TONG: This is Peter Tong from

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1 Russ, August & Kabat on behalf of VirtaMove
2 Corporation.

3 MR. ANAPOL: Jeremy Anapol of Knobbe
4 Martens Olson & Bear on behalf of defendants.

5 * * *

6 Whereupon,

7 SUSAN CAMERON,

8 a witness called for examination, having been
9 first duly sworn, was examined and testified as
10 follows:

11 * * *

12 EXAMINATION

13 BY MR. ANAPOL:

14 Q. Good morning, Ms. Cameron. How are
15 you today?

16 A. Good morning. Good. Thank you.

17 Q. So, my name is Jeremy, and I will be
18 taking your deposition today.

19 Have you been deposed before?

20 A. No.

21 Q. Okay. So, it is just basically a
22 series of questions and answers. They are being

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1 transcribed by the court reporter and reported --
2 recorded by Billy, our videographer.

3 And so the goal here is just to
4 collect some information from you and it is
5 transcribed and recorded so the parties can refer
6 to it later in court filings, if necessary, to
7 help the court make whatever decisions need to be
8 made in this case.

9 And, so, I will ask questions and I
10 will just request that you wait until I finish my
11 question to begin answering.

12 If we talk over each other, the
13 court reporter can't transcribe us both at once
14 or can't hear us. So, it is helpful if you just
15 wait for the question to be completed.

16 If you don't understand one of my
17 questions, feel free to ask for clarification.
18 If you don't ask for clarification, I will assume
19 you understand the question.

20 If you need to take a break at any
21 time, just let me know. But I will just ask that
22 if there is a question pending at that time, you

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1 answer the question before we take the break.

2 Is there any reason why you cannot
3 provide complete and accurate testimony today?

4 A. No.

5 Q. And could you please state your full
6 name for the record?

7 A. Susan Cameron.

8 Q. Any middle name, or no?

9 A. Yes. Hedwig.

10 Q. Hedwig, okay.

11 And where do you live? Just the
12 city. I don't need your address, but just where
13 you reside.

14 A. Sure. Ottawa, Ontario.

15 Q. Okay. And is that where you are
16 today?

17 A. Yes.

18 Q. And are you in an office or are you
19 at home?

20 A. I am in an office.

21 Q. And is that VirtaMove's office?

22 A. I am at the space that VirtaMove

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1 leases, yes.

2 Q. Okay. And, VirtaMove here is
3 VirtaMove, Corporation, which is a Canadian
4 corporation, right?

5 A. Yes.

6 Q. And there is also a VirtaMove, Inc.
7 in the United States; is that true?

8 A. Correct.

9 Q. And what is the relationship between
10 VirtaMove, Corp. in Canada and VirtaMove, Inc. in
11 the United States?

12 A. VirtaMove, Corp. is the parent
13 company. VirtaMove, Inc. in the U.S. is the
14 subsidiary.

15 Q. And do you work for one of those
16 companies?

17 A. Yes.

18 Q. Which one?

19 A. VirtaMove, Corp.

20 Q. So, you have no employment
21 relationship with VirtaMove, Inc.?

22 A. Correct.

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1 Q. And how long have you worked at
2 VirtaMove, Corp.?

3 A. 12 years.

4 Q. And just for the sake of clarity, if
5 I just say VirtaMove, I'm referring to VirtaMove,
6 Corp.

7 If I am talking about the other
8 entity, I will refer to it as VirtaMove, Inc. or
9 VirtaMove USA. Do you understand that?

10 A. Yes.

11 Q. And when we are talking about
12 VirtaMove, Corp., I just want to clarify that
13 there was some predecessor companies.

14 Do you understand that?

15 A. Yes.

16 Q. And can you just explain for the
17 record the names of those predecessor companies?

18 A. Yes. Trigence Corp., AppZero,
19 AppZero Software, and VirtaMove.

20 Q. Okay. And so, if we are talking
21 about VirtaMove, but in a time frame where it had
22 a different name, we might be referring to

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1 Trigence or AppZero, or AppZero Software. Do you
2 understand that?

3 A. Yes.

4 Q. And so when you say you have worked
5 at VirtaMove for 12 years, you first started
6 working at the company when it was operating
7 under a different name, correct?

8 A. Correct.

9 Q. And what was it called when you
10 started working at VirtaMove?

11 A. AppZero Software.

12 Q. Okay. Do you have an understanding
13 of why it went from being AppZero to AppZero
14 Software?

15 A. Yes.

16 Q. Can you explain that?

17 A. My understanding is that the assets
18 of the company were sold and a new company was
19 rolled out. The new company being called AppZero
20 Software.

21 Q. Okay. And what are your
22 responsibilities at VirtaMove?

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1 A. I am responsible for day-to-day
2 accounting, human resources activities, various
3 administration activities.

4 I support the Board of Directors.
5 Document storage and organization, and various
6 other administrative functions.

7 Q. What kind of support do you provide
8 for the Board of Directors?

9 A. I organize board meetings. I assist
10 with creating regular board meeting
11 presentations.

12 Q. Any other support you provide for
13 the Board of Directors?

14 A. Perhaps in the past, travel
15 organization.

16 Q. And what is your title at VirtaMove?

17 A. Office Manager.

18 Q. And has that been your title at --
19 during the entire duration of your employment
20 with VirtaMove?

21 A. Largely, yes.

22 Q. Have you held any other titles?

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1 A. I do have a different title on my
2 e-mail which is Customer Engagement and Business
3 Operations Manager.

4 Q. And what do you do in your role as
5 Customer Engagement and Business Operations
6 Manager?

7 A. I organize meetings with sales
8 prospects. I follow up, following sales
9 meetings, reaching out to customers. That type
10 of activity.

11 Q. And has your role at VirtaMove been
12 the same throughout your time there?

13 A. No.

14 Q. How has your role at VirtaMove
15 changed over time?

16 A. I think the support that I provide
17 to Nigel Stokes and also to the Board is a little
18 bit more involved than it was in the past.

19 Q. How so?

20 A. Oh, to the extent that, as far as
21 the Board is concerned, when I joined I wasn't
22 expected to organize the presentations.

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1 and search your records again to check that you
2 didn't overlook any other California employees?

3 A. I would be willing to do that. I am
4 also confident, I believe those are the only
5 employees. But, yes.

6 Q. Okay. And Samantha Clark was in San
7 Francisco; is that correct?

8 A. Yes.

9 Q. And let me just clarify that
10 question.

11 When she worked for VirtaMove, she
12 was in San Francisco, correct?

13 A. Yes.

14 Q. And as far as you know, is she still
15 in San Francisco?

16 A. As far as I know.

17 Q. And during the time that you have
18 been at VirtaMove, have VirtaMove's employees
19 visited customers in California?

20 A. Yes.

21 Q. Do you know how often that happened?

22 A. I can estimate.

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1 Q. Okay. What is your best estimate?

2 A. 30 visits.

3 Q. And during the time you have been at
4 VirtaMove, have VirtaMove employees traveled to
5 California for conferences?

6 A. Yes.

7 Q. Can you give me your best estimate
8 of how often that happened?

9 A. Well, that is what I meant by 30
10 visits.

11 Q. I see. Other than for conferences,
12 have VirtaMove employees traveled to California
13 to visit customers?

14 A. Yes.

15 Q. Do you have an estimate of how often
16 that happened?

17 A. If I had to guess eight, maybe, or
18 ten.

19 Q. Okay. And during the time you have
20 been at VirtaMove, have VirtaMove employees
21 traveled to Texas for conferences?

22 A. For corporate events, yes.

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1 Q. Are you making a distinction between
2 corporate events and conferences?

3 A. No, not really, I guess.

4 Q. What do you mean by corporate
5 events?

6 A. So, a company-sponsored event as
7 opposed to an industry event, I suppose.

8 Q. Okay. During the time you have been
9 at VirtaMove, have VirtaMove employees traveled
10 to Texas for industry conferences?

11 A. I don't think so.

12 Q. And, your estimate earlier of about
13 30 trips to California, was that for industry
14 conferences?

15 A. I think it would be a combination of
16 industry conferences and corporate. But mostly
17 industry, yes.

18 Q. And, what is your best estimate of
19 how many times VirtaMove employees have traveled
20 to Texas for corporate events?

21 A. It would be once or twice.

22 Q. And where in Texas were those

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1 corporate events?

2 A. I don't know.

3 Q. And those travels to California,
4 including about 30 conferences and corporate
5 events, have those taken place in northern
6 California?

7 A. Can I clarify something?

8 Q. Sure.

9 A. The 30 events would include customer
10 visits and corporate and industry events.

11 Q. Thank you for the clarification.

12 A. Can you repeat your last question?

13 Q. For those 30 visits to California,
14 do you have an estimate of how many have been to
15 northern California?

16 A. If I had to guess, I would say 20.

17 MR. TONG: Objection, calls for
18 speculation.

19 THE WITNESS: In my opinion, I would
20 guess 20.

21 BY MR. ANAPOL:

22 Q. Okay. And that guess is based on

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1 your 12 years of experience at VirtaMove,
2 correct?

3 A. Yes.

4 Q. And part of your role at VirtaMove
5 is or has been to schedule travel, correct?

6 A. Yes.

7 Q. So, VirtaMove's counsel produced
8 some documents to Amazon in this case which
9 appear to have come from you.

10 So, my question is, did you provide
11 a set of documents to VirtaMove's counsel in this
12 case?

13 MR. TONG: Objection, privilege.
14 Don't answer that.

15 THE WITNESS: I believe that is
16 privileged so I won't be able to answer.

17 MR. ANAPOL: Pete, are you telling
18 me that she didn't provide any non-privileged
19 documents to you?

20 MR. TONG: I'm telling you that what
21 she provided to me is privileged. That is
22 classical attorney/client communications.

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1 about travel to California?

2 MR. TONG: Same objection.

3 THE WITNESS: Can you rephrase the
4 question again?

5 BY MR. ANAPOL:

6 Q. I would like you to answer the
7 question that I asked.

8 Do you see anything in this document
9 about travel to California?

10 MR. TONG: Same objection.

11 THE WITNESS: Not California. No.

12 BY MR. ANAPOL:

13 Q. Do you see anything in this document
14 about travel to some other location?

15 A. No.

16 Q. What is this document?

17 A. This document is confirmation of a
18 registration for Greg O'Connor to attend
19 AWS re:Invent, a industry trade show.

20 Q. Do you know where that industry
21 trade show took place?

22 A. I believe it took place in

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1 California.

2 Q. Are you sure that it took place in
3 California?

4 A. Yes.

5 Q. Okay. So, you think this document
6 is evidence of travel to California?

7 A. Yes.

8 Q. Okay. Where in California do you
9 think this conference took place?

10 A. I think San Francisco.

11 Q. And you believe that Greg O'Connor,
12 who was the CEO of VirtaMove at the time,
13 traveled to San Francisco for this conference?

14 A. Yes.

15 Q. And if Greg O'Connor had traveled to
16 San Francisco for this conference, would you have
17 booked his travel?

18 A. Yes, probably.

19 Q. And do you have in your e-mails any
20 confirmation e-mails showing flights that Greg
21 O'Connor took to San Francisco?

22 A. Yes, probably.

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1 Q. And did you provide those
2 confirmation e-mails to your counsel?

3 A. No, I don't think so.

4 Q. Why not?

5 A. Well, this document here confirms
6 that Greg did attend or was registered to attend
7 AWS re:Invent in California.

8 Q. But you agree with me that this
9 document says nothing about California, correct?

10 MR. TONG: Objection. Foundation.

11 THE WITNESS: Correct.

12 MR. ANAPOL: Billy can we pull up
13 Document J? And let's mark this as
14 Exhibit 1003.

15 (Exhibit 1003 marked for
16 identification.)

17 MR. ANAPOL: And, Billy, just let me
18 know when that is done.

19 THE VIDEOGRAPHER: Yes, it is in the
20 Box.

21 MR. ANAPOL: Great.

22 BY MR. ANAPOL:

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1 Q. Ms. Cameron, do you see

2 Exhibit 1003?

3 A. Not yet.

4 MR. ANAPOL: You may need to refresh
5 your browser.

6 THE WITNESS: I did.

7 THE VIDEOGRAPHER: Yes, I see that
8 it is in there.

9 THE WITNESS: Okay. 1003?

10 BY MR. ANAPOL:

11 Q. Yes. Do you have Exhibit 1003?

12 A. I see the file details, and I have
13 clicked on that. But, I'm not seeing the actual
14 file. I'm not sure how to -- hang on. Let me
15 try again.

16 Thank you. Yes, I have it now.

17 Q. Great. What is Exhibit 1003?

18 A. It is a registration event for an
19 AWS re:Invent conference attendance.

20 Q. And this is for a different year
21 than the document that we just looked at,
22 Exhibit 1002, correct?

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1 A. Yes, that's correct.

2 Q. So, this document, Exhibit 1003, is
3 for AWS re:Invent 2013, correct?

4 A. It is.

5 Q. And does this document say anything
6 about California?

7 MR. TONG: Objection, vague.

8 THE WITNESS: No.

9 BY MR. ANAPOL:

10 Q. Do you think this conference took
11 place in California?

12 A. I think it did.

13 Q. Where in California do you think
14 this conference took place?

15 A. Likely San Francisco.

16 Q. And do you think Mr. O'Connor
17 traveled to San Francisco for AWS re:Invent in
18 2013?

19 A. Yes.

20 Q. And Mr. O'Connor was the CEO of
21 VirtaMove at that time?

22 A. Yes.

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1 to?

2 A. If memory serves me correctly -- it
3 is going back a little ways, though.

4 I think it was a \$200,000 line of
5 credit or loan, using their terminology. I think
6 that was the amount, but I'm not 100 percent
7 certain.

8 Q. And do you know if anybody estimated
9 the value of VirtaMove's patents in connection
10 with the loan?

11 MR. TONG: Objection. Scope.

12 THE WITNESS: No, I'm not aware of
13 anything like that.

14 BY MR. ANAPOL:

15 Q. Are you aware of anybody at
16 VirtaMove ever having traveled to Midland, Texas?

17 A. I couldn't say. I don't know.
18 There was a lot of travel at one time.

19 Q. Well, in your years of arranging
20 travel for VirtaMove employees, have you ever
21 arranged travel to Midland, Texas?

22 A. I can't remember specifically

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1 arranging travel to Midland, Texas.

2 Whether somebody went there or not,

3 I don't know that.

4 Q. But in preparing to testify about

5 VirtaMove's contacts with Texas, you didn't come

6 across any information about VirtaMove employees

7 travelling to Midland, Texas, correct?

8 A. Not specifically to Midland, Texas.

9 Q. Do you know where Midland, Texas is?

10 A. No.

11 MR. ANAPOL: Billy, can we put up

12 Document F and mark it as Exhibit 1006?

13 (Exhibit 1006 marked for

14 identification.)

15 BY MR. ANAPOL:

16 Q. Ms. Cameron, do you have

17 Exhibit 1006 on your screen?

18 A. Yes.

19 Q. Okay. And I apologize that the

20 Bates Number is unreadable.

21 But just for the record, this is

22 Bates Number VM_Amazon_0001309.

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1 MR. ANAPOL: Billy might be able to
2 zoom in. It is on the very far bottom right.

3 THE WITNESS: Okay. Thank you.

4 BY MR. ANAPOL:

5 Q. Do you see that Bates Number there?

6 A. Yes.

7 Q. Do you know what this Exhibit 1006
8 shows?

9 A. Yes.

10 Q. Did you take the photograph in
11 Exhibit 1006?

12 A. Yes.

13 Q. What is shown in this photograph,
14 Exhibit 1006?

15 A. Well these are two boxes of patents
16 and trademarks documents.

17 Q. And why did you take this picture?

18 MR. TONG: Objection. Privilege.

19 Instruct the witness not to answer.

20 THE WITNESS: I won't answer that
21 question.

22 BY MR. ANAPOL:

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1 Q. You took this picture at the
2 direction of counsel?

3 MR. TONG: Objection, privilege.

4 You can answer yes or no.

5 THE WITNESS: Yes.

6 BY MR. ANAPOL:

7 Q. And, what does this picture tell
8 you?

9 MR. TONG: Objection. Vague.

10 THE WITNESS: What do you mean
11 specifically?

12 BY MR. ANAPOL:

13 Q. I just don't know why you sent this
14 picture to us; so I'm trying to figure out what
15 the point of it is.

16 Do you know what the point of this
17 picture is?

18 A. To demonstrate, I believe, the
19 volume of files associated with these patents,
20 and that they are physical.

21 Q. Okay. So, you have some physical
22 files associated with some patents. Correct?

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1 A. There are a number of files that are
2 associated with patents, yes.

3 Q. Okay. And what is shown in this
4 picture is two cardboard boxes, what we call
5 banker boxes, right?

6 A. Yes.

7 Q. So, it is two banker boxes that are
8 not quite full. Correct?

9 A. It is --

10 MR. TONG: Objection, foundation.

11 THE WITNESS: Sorry, Peter?

12 MR. TONG: Objection, foundation.

13 You can go ahead and answer the question.

14 THE WITNESS: Uh-huh. Jeremy, it is
15 difficult to tell from this picture.

16 Certainly the box on the left is
17 extremely full and very, very heavy. The box
18 on the right is slightly less full. But
19 again it is difficult to tell because the
20 files are slipping backwards.

21 BY MR. ANAPOL:

22 Q. Okay. And these boxes include

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1 information about patents and information about
2 trademarks, correct?

3 A. Yes.

4 Q. And you understand that VirtaMove is
5 not asserting any trademarks in this case,
6 correct?

7 A. Understood.

8 Q. So, some of the files in these boxes
9 are not related to this case, correct?

10 A. Correct.

11 Q. Okay. And these files also address
12 patents that are not at issue in this case,
13 correct?

14 A. Yes.

15 Q. What is that spiral notebook in the
16 back of the right-hand box?

17 A. I don't know.

18 Q. You don't know?

19 A. No.

20 Q. Does this box have any information
21 that wasn't submitted to the Patent Office?

22 A. Yes.

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1 Q. What information is in these boxes
2 that was not submitted to the Patent Office?

3 A. Let me be clear --

4 MR. TONG: Objection -- hold on.

5 Objection, caution the witness not
6 to reveal the nature of any attorney/client
7 privileged information that may be in the
8 boxes.

9 THE WITNESS: I will be clear. I
10 have not reviewed all of the documents in
11 these boxes. There are a lot of documents.
12 There is certainly legal correspondence
13 included in those boxes.

14 BY MR. ANAPOL:

15 Q. What do you mean by legal
16 correspondence?

17 A. So, based on the time, if we
18 considered 2003, 2004, many people printed out
19 their e-mails.

20 There are a lot of e-mail printouts
21 in those boxes. And included in those e-mail
22 printouts are communications with counsel.

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1 Q. So, privileged communications are
2 included among the papers in these boxes in
3 Exhibit 1006, correct?

4 A. Yes, correct.

5 Q. And, of course, you are not going to
6 tell me what the contents of those privileged
7 documents, correct?

8 A. Correct.

9 Q. And you are not going to go use
10 those privileged documents to prove anything at
11 trial. Correct?

12 A. I'm not a lawyer. I don't think
13 that is a call that I can make. I don't know.

14 MR. ANAPOL: Are you planning to
15 waive the privilege over these documents?

16 MR. TONG: My client is not waiving
17 privilege.

18 BY MR. ANAPOL:

19 Q. Okay. So, can you tell me what
20 portion of the documents in these two boxes
21 relate specifically to the two patents in this
22 case and is not privileged?

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1 A. Oh, I don't think I can tell you
2 that.

3 MR. ANAPOL: Okay. Billy, can we do
4 Document E and mark it as Exhibit 1007,
5 please.

6 (Exhibit 1007 marked for
7 identification.)

8 BY MR. ANAPOL:

9 Q. Ms. Cameron, do you recognize
10 Exhibit 1007?

11 A. Just getting to it. Sorry. No, I
12 guess not.

13 Q. So, you don't recall providing this
14 document, Exhibit 1007, to VirtaMove's counsel?

15 A. I may have. I don't remember if I
16 included this specifically.

17 Again, I provided quite a number of
18 documents. I don't remember each and every one
19 of them.

20 Q. Okay. Did you look at VirtaMove's
21 files to see if VirtaMove has any notebooks that
22 belonged to the inventors of the patents in suit?

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1 CERTIFICATE OF NOTARY

2 I, LORI J. GOODIN, RPR, CRR,

CA CSR # 13959 the Notary for this deposition, do

3 hereby certify that the witness whose testimony

appears in the foregoing deposition was sworn by

4 me; that I am neither counsel for, related to,

nor employed by any of the parties to the action

5 in which this deposition was taken; and, further, that I am

not a relative or employee of any attorney or

6 counsel employed by the parties hereto, or

financially or otherwise interested in the

7 outcome of this action.

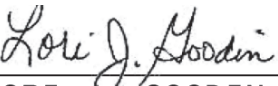
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LORI J. GOODIN, RPR, CLR, CRR
Notary Public in and for:

13 STATE OF FLORIDA, COUNTY OF SARASOTA

Notary Commission Number: GG987804

14 My Commission expires: May 12, 2028

STATE OF CALIFORNIA, CA CSR# 13959

15 My Commission expires: February 22, 2025

STATE OF MARYLAND, COUNTY OF ANNE ARUNDEL

16 My Commission expires: August 2, 2025

17 DISTRICT OF COLUMBIA, WASHINGTON DC

18 My Commission expires: June 1, 2026

19 STATE OF DELAWARE: COUNTY OF KENT

20 My Commission expires: September 9, 2025

21 STATE OF PENNSYLVANIA, COUNTY OF LEHIGH

22 My Commission expires: April 5, 2025